

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re § Chapter 11
§
HOUSTON REGIONAL SPORTS NETWORK, L.P. § Case No. 13-35998
§
Debtor. §

**EMERGENCY MOTION OF PROONENTS TO SEAL
PROONENTS' MEMORANDUM OF LAW IN SUPPORT OF CONFIRMATION OF
THE SECOND AMENDED CHAPTER 11 PLAN DATED SEPTEMBER 30, 2014, IN
RESPECT OF HOUSTON REGIONAL SPORTS NETWORK, L.P.**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

AN EMERGENCY HEARING ON THIS MATTER HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.

TO THE HONORABLE MARVIN ISGUR, UNITED STATES BANKRUPTCY JUDGE:

Houston Regional Sports Network, L.P. ("HRSN" or the "Debtor"), as debtor and debtor in possession, Houston Astros, LLC, and Rocket Ball, Ltd. (collectively, the "Proponents") file

this Emergency Motion of Proponents to Seal Proponents' Memorandum of Law in Support of Confirmation of the Second Amended Chapter 11 Plan Dated September 30, 2014, In Respect of Houston Regional Sports Network, L.P. (the "Motion"). In support of the Motion, the Proponents respectfully represent:

Basis for Emergency Relief

1. The Proponents file this Motion on an emergency basis to request authority from the Court to file, under seal, a copy of the Proponents' Memorandum of Law in Support of Confirmation of the Second Amended Chapter 11 Plan Dated September 30, 2014, In Respect of Houston Regional Sports Network, L.P. (the "Proponents' Confirmation Brief"), to be delivered to the Court contemporaneously with the filing of this Motion, as required under the current scheduling agreement of the parties. Consideration of the Motion on an emergency basis will allow the Proponents to ensure, as soon as possible, that the confidential and/or highly confidential materials contained or referred to in the Proponents' Confirmation Brief are protected pursuant to the Protective Order (defined below).

Jurisdiction and Venue

2. This Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue of this case and this Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

Background

3. On September 27, 2013 (the "Petition Date"), certain petitioning creditors filed a petition for involuntary bankruptcy relief pursuant to section 303 of the Bankruptcy Code.

4. On February 4, 2014 (the "Commencement Date"), the Court entered an Order for Relief and Case Management Order.

5. The Debtor continues to manage and operate its business as a debtor-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code. No official committee of unsecured creditors has been appointed in this Chapter 11 case. Further, no trustee or examiner has been appointed in this bankruptcy case.

6. The Debtor develops, owns and operates a regional television sports network in and around the greater Houston, Texas metropolitan area. The network's content includes sports events involving Houston-based athletic organizations, including the Houston Astros and the Houston Rockets.

7. The Debtor has three (3) limited partners: Houston SportsNet Holdings, LLC, which is an affiliate of Comcast, Inc. ("Comcast Owner"); Rockets Partner, L.P. (the "Rockets"); and Astros HRSN LP Holdings LLC (the "Astros"). The Debtor's general partner is Houston Regional Sports Network, LLC (the "General Partner").

8. On September 30, 2014, the Proponents filed the *Second Amended Chapter 11 Plan of Reorganization dated September 4, 2014 In Respect of Houston Regional Sports Network, L.P.* (as subsequently amended and/or modified, the "Plan") (Doc. No. 650). The parties have, contemporaneously with the filing of this Motion, requested that the confirmation hearing resume on October 22, 2014 at 10 a.m. (Central), and have also agreed to submit their respective briefs concerning confirmation of the Plan to the Bankruptcy Court by October 20, 2014 at 11:00 a.m. (Central).

Relief Requested

9. In advance of the requested date for recommencement of the confirmation hearing, and pursuant to the agreement of the parties, the Proponents will submit to the Court and the Comcast Entities, by 11 a.m. (Central) on October 20, 2014, an unredacted copy of the Proponents' Confirmation Brief. The Proponents' Confirmation Brief contains or refers to

certain information that has been designated as Confidential and/or Highly Confidential under the terms of the *Stipulation and Agreed Order Governing the Production and/or Disclosure of Confidential Plan Documents and Discovery Materials and Authorizing the Filing of Certain Documents Under Seal* (the “Protective Order”) (Doc. No. 492).

10. By this Motion, pursuant to Section 107(b)(1) of the Bankruptcy Code and Rule 9018 of the Federal Rules of Bankruptcy Procedure, the Proponents request that the Court authorize the filing of the Proponents’ Confirmation Brief under seal.

11. Paragraph 19 of the Protective Order provides that information designated as “Confidential” or “Highly Confidential” under the terms of the Protective Order be submitted to the Court under seal. As stated above, the Proponents will submit an unredacted version of the Proponents’ Confirmation Brief to the Court and the Comcast Entities. If the Court grants the Motion, the Proponents will, upon approval from the Comcast Entities pursuant to paragraph 19 of the Protective Order, promptly file a proposed, redacted version of the Proponents’ Confirmation Brief on the docket. To protect the confidentiality of the information designated as Confidential and/or Highly Confidential, the Proponents request that the unredacted version of the Proponents’ Confirmation Brief submitted to the Court be kept under seal pursuant to the Protective Order.

WHEREFORE the Proponents respectfully request the entry of an order granting the relief requested herein and such other and further relief as is just and proper.

Dated: October 20, 2014
Houston, Texas

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Certification of Accuracy Pursuant to Local Rule 9013-1(i)

Pursuant to Local Rule 9013-1(I), undersigned counsel hereby certifies the accuracy of the facts set forth in the foregoing Motion.

/s/ Charles A. Beckham, Jr.
Charles A. Beckham, Jr.